

**Notice of RCRA Class 1 Permit Modification
in Accordance with 20 NMAC 4.1.900 (40 CFR Part 270)**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

September 14, 2000

**Notice of RCRA Class 1 Permit Modification
in Accordance with 20 NMAC 4.1.900 (40 CFR Part 270)**

Consistent with requirements of 20 New Mexico Administrative Code (NMAC) 4.1.900 (hereafter referred to as Part 270 or Section 270.XX) the U.S. Department of Energy, Carlsbad Area Office is submitting to the New Mexico Environment Department (NMED) a notice of Class 1 modifications to the Hazardous Waste Facility Permit (NM4890139088-TSDF) for the Waste Isolation Pilot Plant (WIPP). Specifically, this information is provided to comply with the requirements of Section 270.42(a)(1).

The modifications are listed in Table 1. Listed information includes a reference to the applicable section of the permit, a brief description of each item, and the class of the item, as identified in Appendix I to Section 270.42. The relevant permit modification category, as identified in Appendix I, is provided as well. A more complete description of the class 1 modifications are provided in Attachment A. Several of these modifications are the result of discussions with the NMED regarding Class 1 modifications that were previously submitted. The NMED requested that changes be made in several of the previous modifications to clarify the change or to resolve other difficulties identified by the NMED. Each is discussed separately in Attachment A.

The identified changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment and the modified permit is no less stringent than the current permit.

Table 1. Class 1 Hazardous Waste Facility Permit Modification

| No. | Affected Permit Section | Item | Category | Attachment 1 Page # |
|------------|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------|
| 1. | a .Figure F-3, F- 5, F-9 b. Figure I-1, I2-1, I-6 c. Figure M2-1 d. D1, Underground Openings Inspection Checklist | Update applicable underground figures to add Panel II and revise the underground inspection form to include openings associated with Panel II that require inspection. | A.1 | A-1 |

Attachment A

Descriptions of the Hazardous Waste Facility Class 1 Permit Modifications

Item 1

Description:

Revise several Figures and underground inspection form.

Basis:

The permit changes reflect the current underground facility. No requirements are reduced or removed.

Discussion:

The modified documents reflect the changes as a result of mining Panel II in accordance with the WIPP Hazardous Waste Facility Permit Module IV.E. Seven figures and the underground inspection form were updated. These updates are required to correspond with the recent completion of Panel II in the WIPP underground.

Revised Permit Text:

- 1.a. Revised Figures F-3, F-5, F-9 are included in Attachment B
- 1.b. Revised Figures I-1, I2-1, and I-6 are included in Attachment B
- 1.c. Revised Figure M2-1 is included in Attachment B
- 1.d. Revised D, Underground Openings Inspection Checklist is included in Attachment B

ATTACHMENT B
SUPPORTING INFORMATION

Item 1.a.
Revised Figure F-3, Figure F-5, Figure F-9,

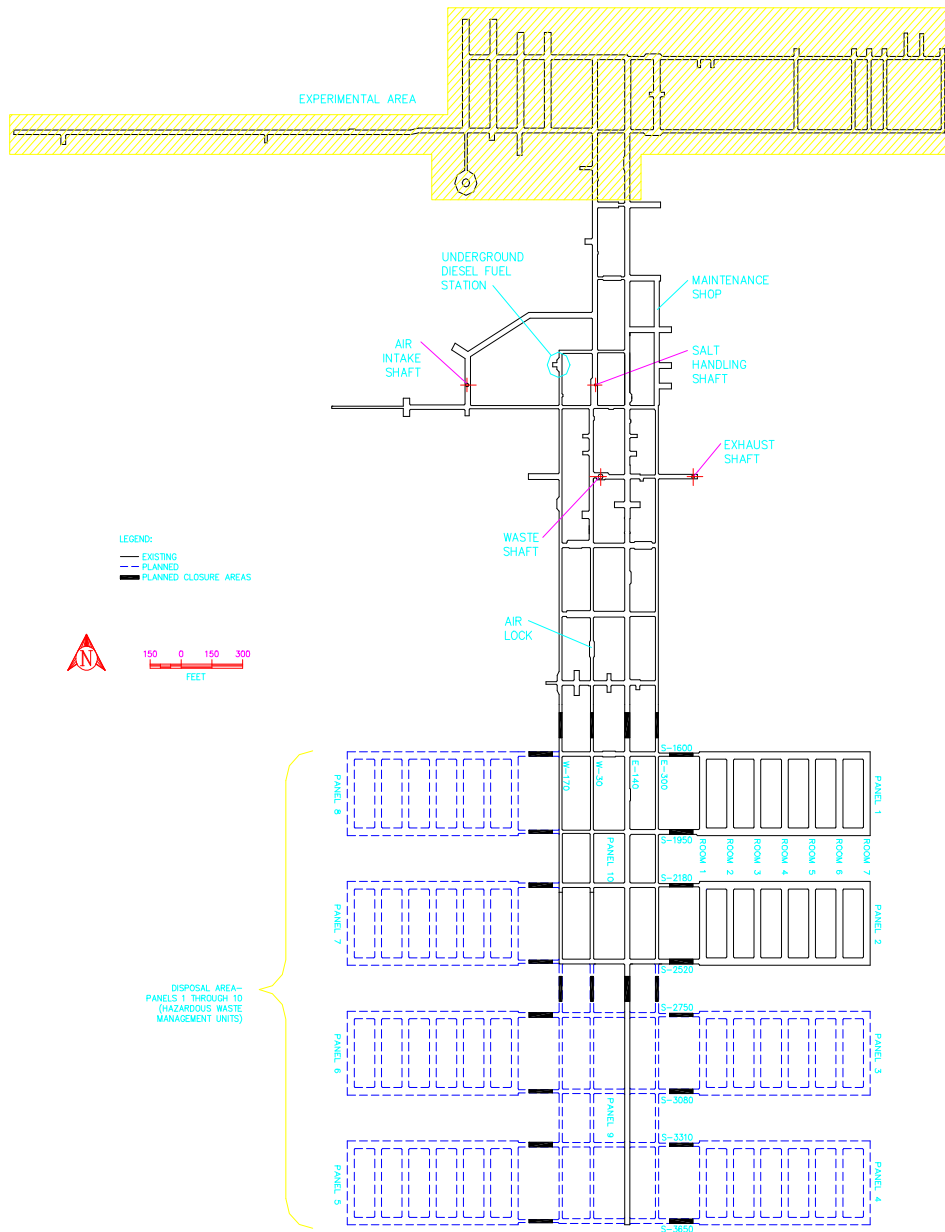


Figure F-3
WIPP Underground Facilities
PERMIT ATTACHMENT F
Page F-81

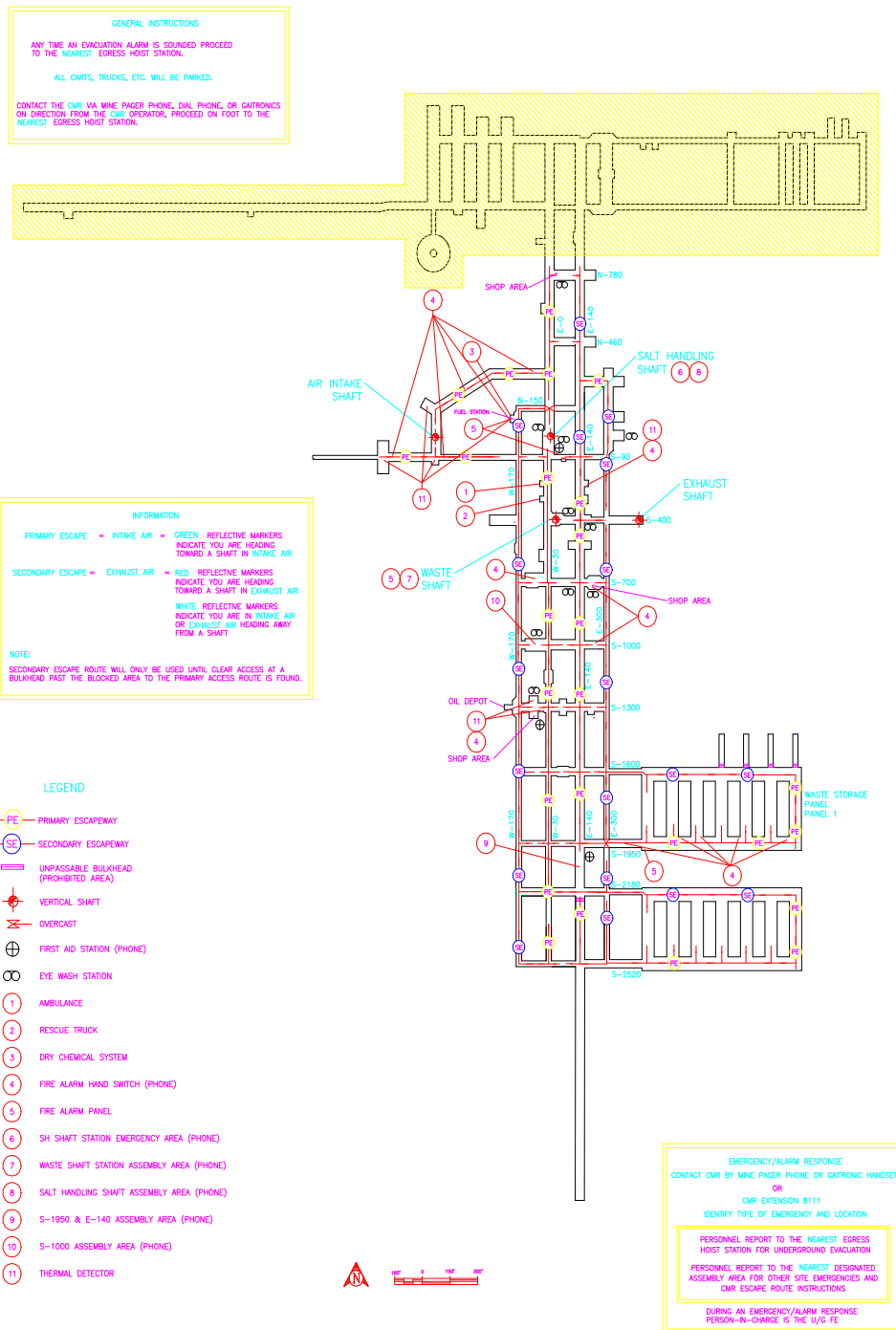


Figure F-5
Underground Emergency Equipment Locations and Underground Evacuation Routes

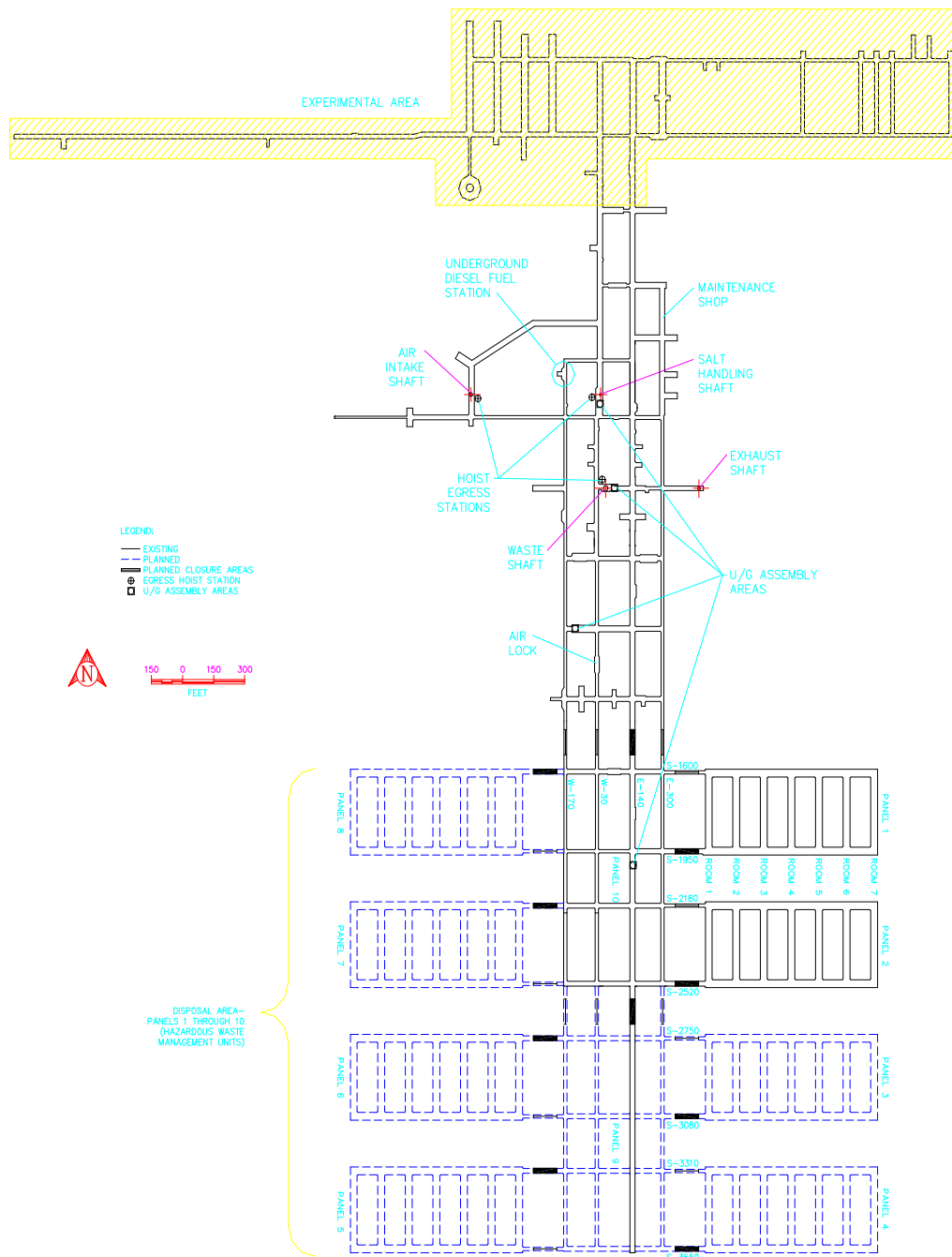


Figure F-9
Designated Underground Assembly Areas

Item 1.b.
Figure I-1, Figure I2-1, and Figure I-6

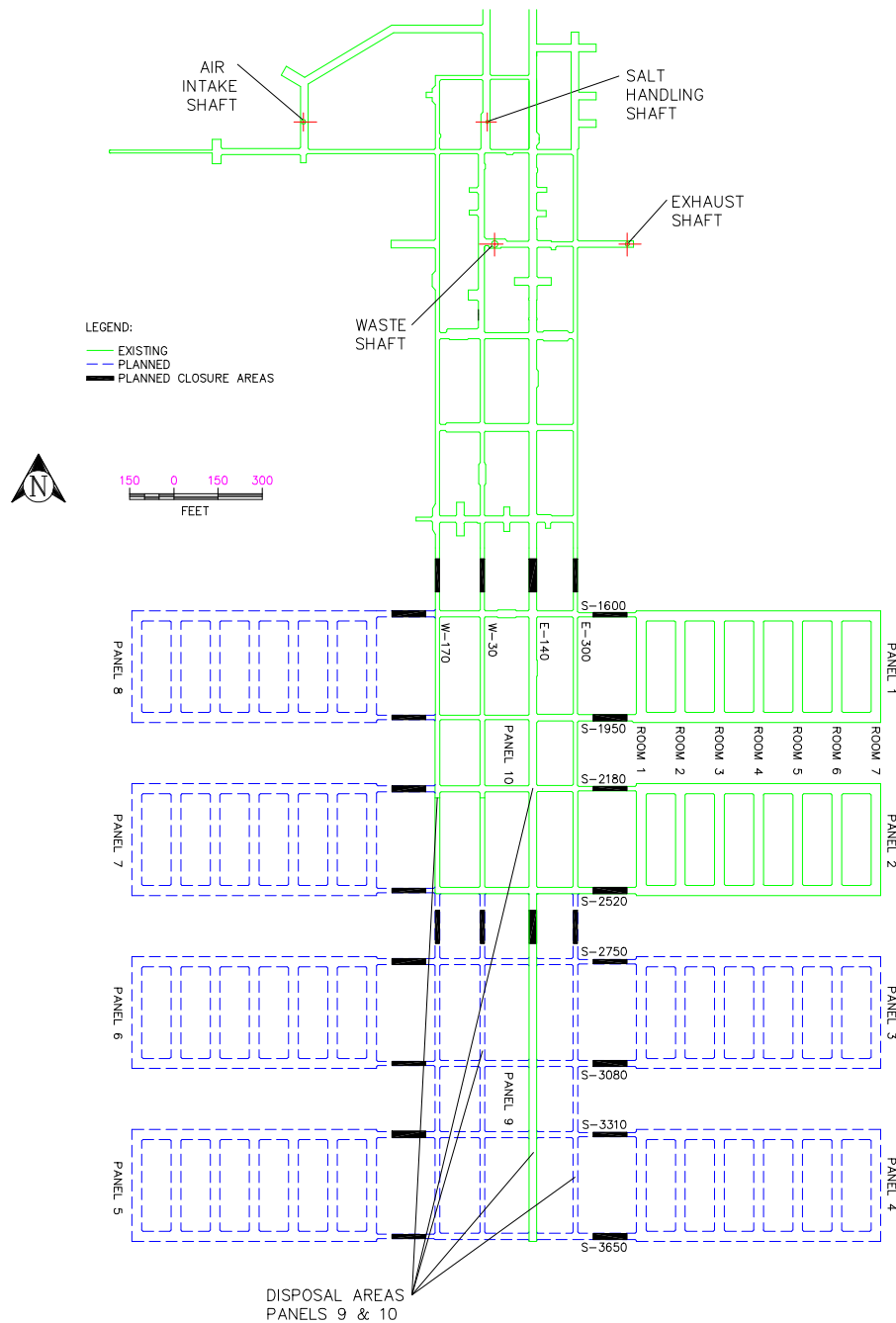
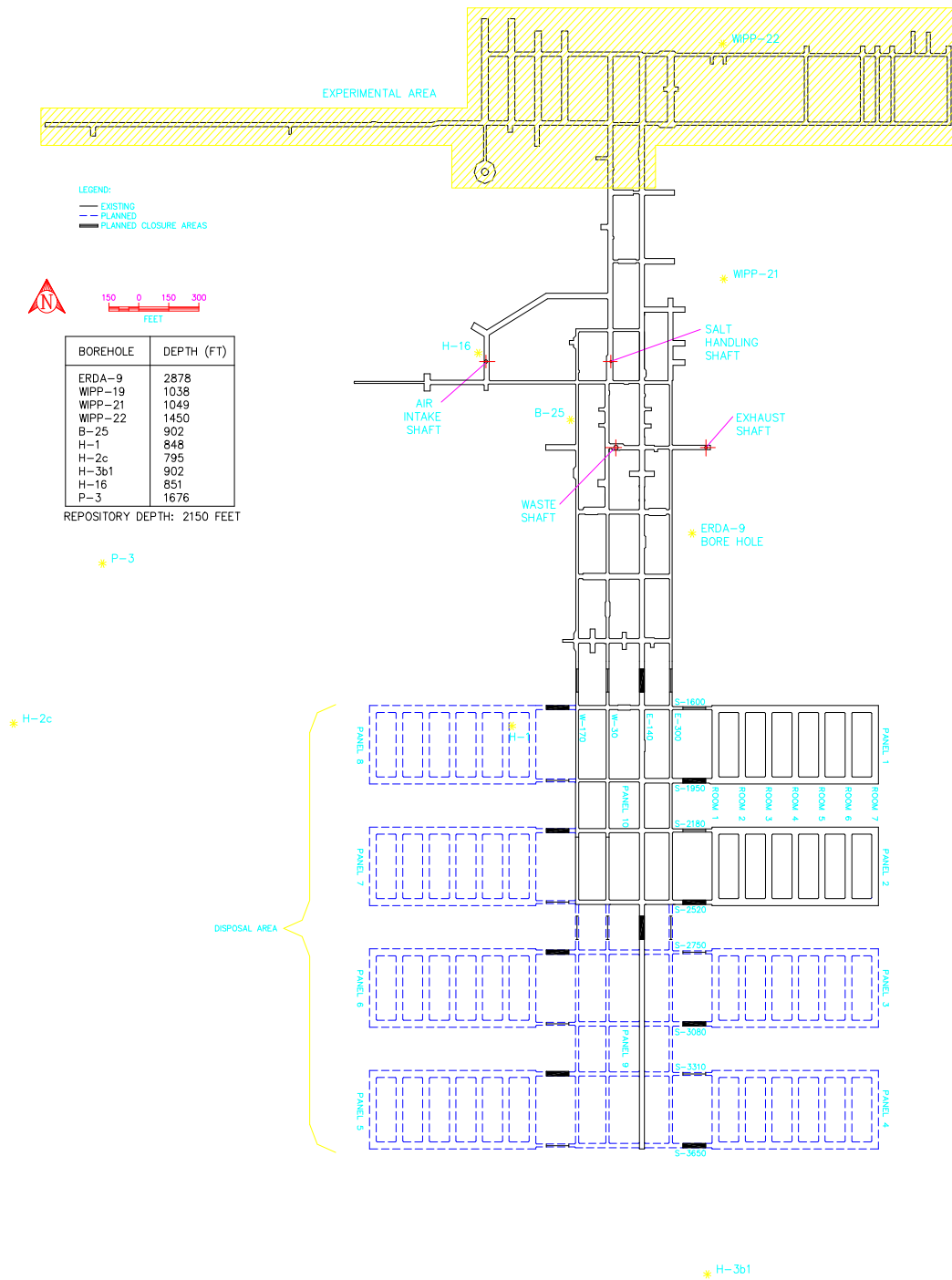


Figure I-1
Location of Underground HWDUs and Anticipated Closure Locations



Item 1.c.
Figure M2-1

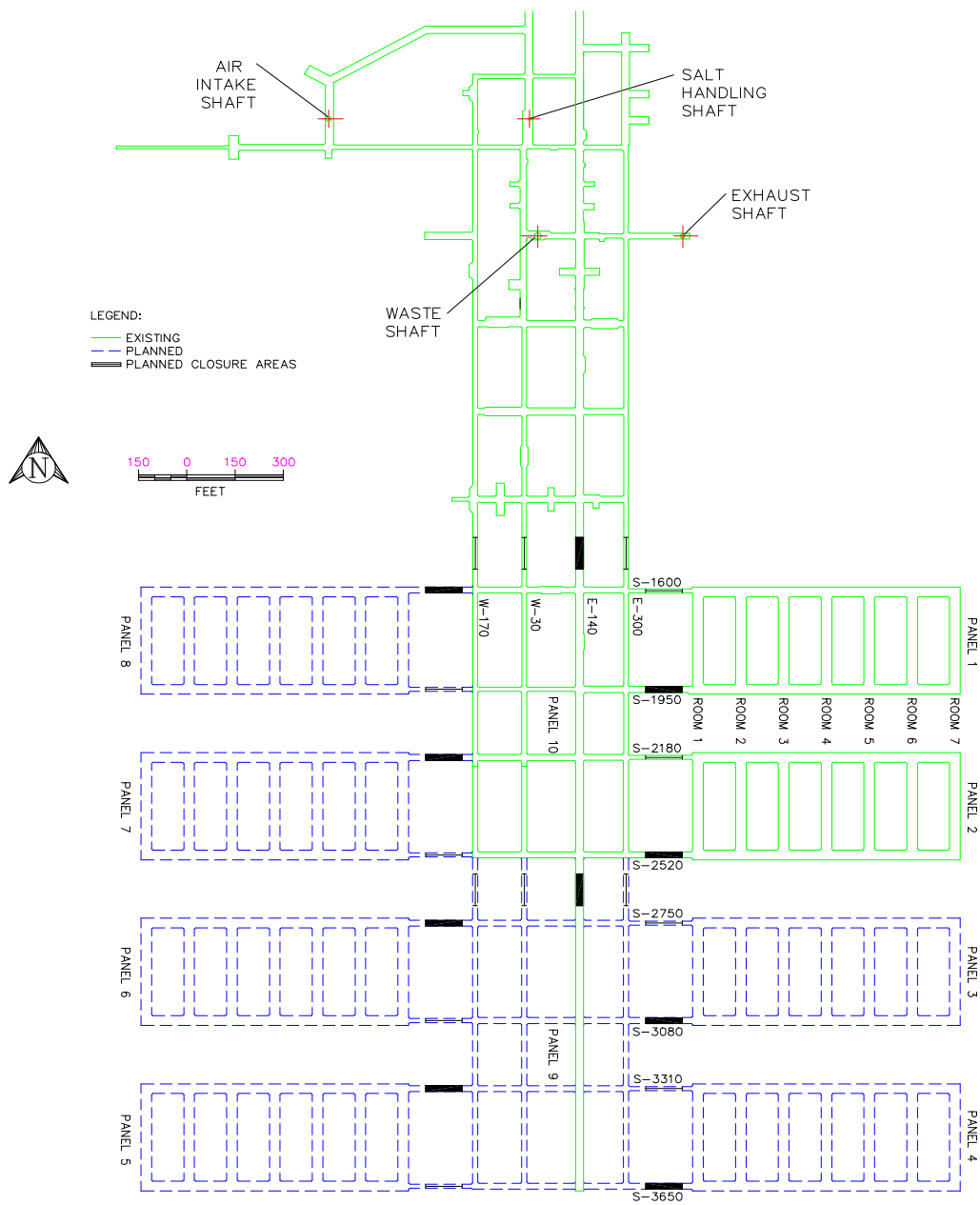


Figure M2-1
Repository Horizon

Item 1.d.

Revised D1, Underground Openings Inspection Checklist

Attachment -1 Underground Openings Inspection Checklist

| DATE: _____ | | TIME: _____ | |
|-----------------------------------------------------------|----------|-----------------------|----------------------|
| Record Inspection Type: _____ | | Weekly: _____ | Annual: _____ |
| DRIFT | INITIALS | COMMENT & OBSERVATION | ACTION TAKEN & DATE |
| E-140 FROM N-150 TO S-1950 | | | |
| E-300 FROM S-90 TO S-1950 | | | |
| S-90, S-400, S-700 S-1000, S-1300 AND S-550 ALCOVES | | | |
| S-1600 AND S-1950 | | | |
| ROOM 1 PANEL 1 | | | |
| ROOM 2 PANEL 1 | | | |
| ROOM 3 PANEL 1 | | | |
| ROOM 4 PANEL 1 | | | |
| ROOM 5 PANEL 1 | | | |
| ROOM 6 PANEL 1 | | | |
| ROOM 7 PANEL 1 | | | |
| ADDITIONAL INFORMATION | | | |
| INSPECTION PERFORMED BY (PRINT NAME): _____ | | | |
| SIGNATURE: _____ | | | |

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Attachment -1 Underground Openings Inspection Checklist

| | | | |
|---------------------------------------------|-----------------|----------------------------------|--------------------------------|
| DATE: _____ | | TIME: _____ | |
| Record Inspection Type: | | Weekly: _____ | Annual: _____ |
| DRIFT | INITIALS | COMMENT & OBSERVATION | ACTION TAKEN & DATE |
| W-30 FROM S-90 TO S-2180 | | | |
| W-170 FROM S-90 TO S-2180 | | | |
| E-140 FROM S-1950 TO S-2180 | | | |
| E-300 FROM S-1950 TO S-2180 | | | |
| S-700, S-1000, AND S-1300 SHOP AREA | | | |
| S-1600, S-1950, S-2180 | | | |
| CORE STORAGE LIBRARY | | | |
| S-1300 OIL BAY | | | |
| W-170 FUEL BAY | | | |
| ADDITIONAL INFORMATION | | | |
| | | | |
| | | | |
| INSPECTION PERFORMED BY (PRINT NAME): _____ | | | |
| SIGNATURE: _____ | | | |

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Attachment -1 Underground Openings Inspection Checklist

| | | | |
|---------------------------------------------|-----------------|----------------------------------|--------------------------------|
| DATE: _____ | | TIME: _____ | |
| Record Inspection Type: | | Weekly: _____ | Annual: _____ |
| DRIFT | INITIALS | COMMENT & OBSERVATION | ACTION TAKEN & DATE |
| 0-EAST FROM S-90 TO N-812 | | | |
| EAST 140 FROM S-90 TO N-812 | | | |
| S-90 TO ROOM Q ALCOVES | | | |
| N-780, N-620, N-460 ALCOVES | | | |
| N-300, N-215 AND N-135 A.I.S. AREA | | | |
| W-620 AND N-150 | | | |
| WEST-170 BETWEEN S-90 AND N-150 | | | |
| N-250 AND EAST 300 MAINTENANCE SHOP | | | |
| W-170 FROM S2180 TO S2300 | | | |
| | | | |
| | | | |
| ADDITIONAL INFORMATION | | | |
| INSPECTION PERFORMED BY (PRINT NAME): _____ | | | |
| SIGNATURE: _____ | | | |

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Attachment -1 Underground Openings Inspection Checklist

| | | | |
|---------------------------------------------|-----------------|----------------------------------|--------------------------------|
| DATE: _____ | | TIME: _____ | |
| Record Inspection Type: | | Weekly: _____ | Annual: _____ |
| DRIFT | INITIALS | COMMENT & OBSERVATION | ACTION TAKEN & DATE |
| <u>S2180 - W170 TO ROOM 1</u> | | | |
| <u>S2520 - W170 TO ROOM 1</u> | | | |
| <u>S2180 ROOM 1 TO ROOM 7</u> | | | |
| <u>S2520 ROOM 1 TO ROOM 7</u> | | | |
| <u>ROOM 1 OF PANEL 2</u> | | | |
| <u>ROOM 2 OF PANEL 2</u> | | | |
| <u>ROOM 3 OF PANEL 2</u> | | | |
| <u>ROOM 4 OF PANEL 2</u> | | | |
| <u>ROOM 5 OF PANEL 2</u> | | | |
| <u>ROOM 6 OF PANEL 2</u> | | | |
| <u>ROOM 7 OF PANEL 2</u> | | | |
| <u>ADDITIONAL INFORMATION</u> | | | |
| INSPECTION PERFORMED BY (PRINT NAME): _____ | | | |
| SIGNATURE: _____ | | | |

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Attachment -1 Underground Openings Inspection Checklist

| | | | |
|---------------------------------------------|-----------------|----------------------------------|--------------------------------|
| DATE: _____ | | TIME: _____ | |
| Record Inspection Type: | | Weekly: _____ | Annual: _____ |
| DRIFT | INITIALS | COMMENT & OBSERVATION | ACTION TAKEN & DATE |
| <u>NORTH 1100 E140 TO SPVD ROOM 4</u> | | | |
| <u>NORTH 1400 E140 - SPVD ROOM 4</u> | | | |
| <u>SPVD ROOM 4</u> | | | |
| <u>L - 1</u> | | | |
| <u>L - 2</u> | | | |
| <u>L - 3</u> | | | |
| <u>L - 4</u> | | | |
| <u>G - ACCESS</u> | | | |
| <u>E140 - N780 TO N-1400</u> | | | |
| | | | |
| <u>ADDITIONAL INFORMATION</u> | | | |
| INSPECTION PERFORMED BY (PRINT NAME): _____ | | | |
| SIGNATURE: _____ | | | |
| | | | |